

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

IN RE: NEW ENGLAND COMPOUNDING
PHARMACY, INC. PRODUCTS LIABILITY
LITIGATION

MDL No. 2419
Master Dkt.: 1:13-md-02419-FDS

THIS DOCUMENT RELATES TO:

All Actions

**PLAINTIFFS' MOTION FOR ENTRY OF
QUALIFIED PROTECTIVE ORDER
FOR PROTECTED HEALTH INFORMATION**

NOW COME plaintiffs, through the Plaintiffs' Steering Committee ("PSC"), to move this Court for entry of a qualified protective order under the Health Insurance Portability and Accountability Act of 1996 ("HIPAA"), Pub. L. 1-4-191, regulations adopted thereto (see 45 C.F.R. § 164.501, et seq.), and similar state laws in order to protect the information sought by the issuance of subpoenas to hospitals, pharmacies, and clinics. A memorandum of support setting forth the reasons is filed herewith.

WHEREFORE, this motion should be granted.

Dated: June 13, 2013

/s/ Kristen Johnson Parker

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Plaintiffs' Steering Committee

CERTIFICATE OF SERVICE

I, Kristen Johnson Parker, hereby certify that I caused a copy of the foregoing motion for entry of qualified protective order, memorandum in support, and proposed order to be filed electronically via the Court's electronic filing system. Those attorneys who are registered with the Court's electronic filing system may access these filings through the Court's system, and notice of these filings will be sent to these parties by operation of the Court's electronic filing system.

Dated: June 13, 2013

/s/ Kristen Johnson Parker
Kristen Johnson Parker, BBO # 667261